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Co-Counsel for the Class 10 Liquidation Trust

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|---|---|---|
| In the Matter of: | : | UNITED STATES BANKRUPTCY COURT |
| | : | FOR THE DISTRICT OF NEW JERSEY |
| | : | HONORABLE GLORIA M. BURNS |
| SHAPES/ARCH HOLDINGS, L.L.C., <i>et al.</i> , | : | CASE NO. 08-14631(GMB) |
| | : | |
| Debtors. | : | |
| | : | Chapter 11 |
| | : | |
| | : | NOTICE OF MOTION OF THE CLASS 10 |
| | : | LIQUIDATION TRUST FOR AN ORDER |
| | : | GRANTING A FURTHER EXTENSION OF |
| | : | TIME TO FILE OBJECTIONS TO |
| | : | LITIGATION CLAIMS AND INSIDER |
| | : | CLAIMS AND TO ASSERT OBJECTIONS |
| | : | UNDER § 502(d) OF THE BANKRUPTCY |
| | : | CODE |

HEARING DATE AND TIME:
May 26, 2009, at 10:00 a.m.

**ORAL ARGUMENT WAIVED UNLESS
OBJECTIONS TIMELY FILED**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that on May 26, 2009, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, attorneys for the Class 10 Liquidation Trust, shall move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, New Jersey 08101, for entry of an Order granting a further extension of time to file objections to litigation claims and insider claims and to assert objections under § 502(d) of the Bankruptcy Code (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application, which sets forth the relevant factual and legal bases upon which the requested relief should be granted. A proposed Order granting the requested relief also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “Supplemental Commentary”) (the General Order, the Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned does not request oral argument unless objections are timely filed.

Respectfully submitted,

HALPERIN BATTAGLIA RAICHT, LLP
Co-Counsel for the Class 10 Liquidation Trust

By: /s/ Donna H. Lieberman
Donna H. Lieberman
Carrie E. Mitchell

**COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.**
Co-Counsel for the Class 10 Liquidation Trust

By: /s/ Ilana Volkov
Ilana Volkov

DATED: May 5, 2009